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Attorneys for Defendants  
WORTH HOLDINGS, LLC,  
E.S. WEST COAST, LLC,  
ENERGY SYSTEMS

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

THOMAS R. KELLY  
Plaintiff,

v.

WORTH HOLDINGS, LLC; E.S. WEST  
COAST, LLC individually and doing  
business as ENERGY SYSTEMS and  
DOES 1-20,

Defendants.

) Case No.: 3:17-cv-02466-EMC

) Action Filed: March 28, 2017

) **STIPULATION AND [PROPOSED]**  
) **ORDER TO CONTINUE CASE**  
) **MANAGEMENT CONFERENCE AND**  
) **RELATED DEADLINES**

) Date: December 8, 2017  
) Time: 2:00 p.m.  
) Courtroom: 5, 17th Floor  
) Judge: Hon. Edward M. Chen

1 This Stipulation is entered into by and among Plaintiff Thomas R. Kelly (“Plaintiff”)  
2 and Defendants E.S. West Coast, LLC dba Energy Systems and Worth Holdings, LLC  
3 (collectively referred to as “Defendants”), by and through their respective counsel.

4 WHEREAS, on November 20, 2017, the Court entered a Notice (Docket Number 28)  
5 continuing the Further Case Management Conference, initially set for December 7, 2017 to  
6 December 8, 2017 at 2:00 p.m. in Courtroom 5;

7 WHEREAS, pursuant to the foregoing Notice, a Joint Case Management Statement is  
8 currently due by December 1, 2017;

9 WHEREAS, Plaintiff’s counsel, Michael G. Miller, has a scheduled deposition to  
10 commence on December 8, 2017 at 9:00 a.m. in Santa Rosa in another matter which cannot be  
11 rescheduled due to an upcoming trial date. The deposition will last at least six hours, which  
12 would not allow enough time for Mr. Miller to travel to San Francisco for the Further Case  
13 Management Conference on December 8, 2017;

14 WHEREAS, Mr. Miller and Defendants’ counsel, Brandon Kahoush, are both  
15 available to attend a Further Case Management Conference on December 21, 2017 at 1:30  
16 p.m. in Courtroom 5;

17 WHEREAS the parties agree that the continuance of the Case Management  
18 Conference and all related deadlines is necessary;

19 NOW, THEREFORE, pursuant to Local Rule 6-2(a), the Parties hereby stipulate and  
20 agree, through their respective counsel, as follows:

21 1. The December 8, 2017 Further Case Management Conference shall be taken off  
22 calendar and rescheduled to December 21, 2017 at ~~1:30~~ 10:30 a.m. p.m., or another date that is  
23 convenient to the Court.

24 2. The deadline to file the Joint Case Management Conference shall be continued  
25 to and including December 14, 2017.

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1 **IT IS SO STIPULATED**

2 DATED: November 27, 2017

3 PERRY, JOHNSON, ANDERSON,  
4 MILLER & MOSKOWITZ, LLP

KAUFMAN DOLOWICH  
& VOLUCK, LLP

5 /s/ Michael G. Miller

/s/ Brandon Kahoush

6 Michael G. Miller

Brandon Kahoush

7 Attorneys for Plaintiff

Attorneys for Defendants

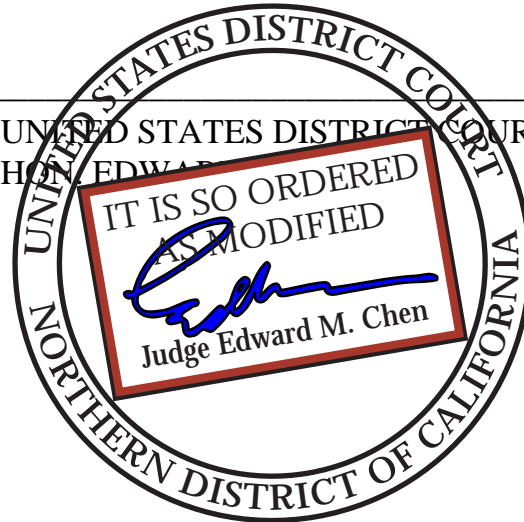
8 THOMAS R. KELLY

WORTH HOLDINGS, LLC, E.S. WEST  
COAST, LLC, ENERGY SYSTEMS

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED** (Revised above)

10 DATED: 11/27, 2017

11 UNITED STATES DISTRICT COURT JUDGE  
12 HON. EDWARD M. CHEN



1                                    **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

2                    I, Michael G. Miller, attest that concurrence in the filing of this Stipulation to Continue  
3 the Case Management Conference and related deadlines has been obtained from the other  
4 signatory. I declare under penalty of perjury under the laws of the United States of America,  
5 that the foregoing is true and correct.

6                    Executed this 27th day of November 2017 in Santa Rosa, California.

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8                    /s/ Michael G. Miller  
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